

APPENDIX D

Request for Alternative Decontamination Approval

American Bag and Metal Company, Inc. Off-Site

Site No.: C734088A

MACTEC Engineering and Consulting, P.C. (MACTEC) is requesting United States Environmental Protection Agency (USEPA) approval of alternative decontamination procedures for the American Bag and Metal Company, Inc. Off-Site (Site) in Syracuse, New York. MACTEC, under contract to the New York State Department of Environmental Conservation (NYSDEC), has prepared an application in accordance with 40 CFR 761.61(a) *Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste*. This request for alternative decontamination procedures coordinates with the cleanup and disposal plan for the Site.

In accordance with 40 CFR 761.79, heavy equipment used for the remediation of PCB contaminated soil or has come in contact with potentially PCB contaminated soil/liquids will require decontamination. Per 40 CFR 761.79(h), MACTEC proposes that alternative decontamination procedures be implemented at the Site for large equipment (i.e. those used for excavation and loading) and the decontamination pad, as described in the following sections of this letter. The following details the scope of work to be performed at the conclusion of Site operations.

CAPSUR - an aqueous-based solvent developed for the clean-up of Polychlorinated Biphenyl (PCBs) on solid surfaces - will be used as the decontamination solution of choice. CAPSUR a product manufactured by Integrated Chemistries, Inc. will be used as the decontamination solution to wash large equipment where necessary, in accordance with the manufacturer directions. The manufacturer's technical data is attached.

Washing will be followed by a rinse stage consisting of a high-pressure, hot-water power-wash. This heated water will be removing any potentially oily residue that may remain from contact with the soil. The power washing will be performed on/over the decontamination pad constructed at the Site so that the rinsate is collected and treated via the on-site water treatment system.

After the decontamination wash/rinses, wipe samples will be collected from surfaces of the equipment to provide a representative residual PCB concentration. A wipe sample will consist of at least one (1) sample collected from each unique portion of the equipment (e.g. bucket, tracks) in contact with soil from excavation areas. An additional sample will be collected from another unique surface of the equipment where there is the potential for particulate accumulation.

This procedure will be performed at the close of the project, repeated as necessary to decontaminate equipment that has/had the potential to contact PCB contaminated soil during the cleanup project. The frequency for testing is proposed to include at least one (1) sample from each distinct surface of the equipment in direct contact with the TSCA contaminated soil/sediment and/or construction water (i.e., tracks and excavator bucket) and at least one (1) sample from a distinct surface of the equipment where particulate (dust) accumulation is likely (i.e., top of cap or undercarriage).

The selected decontamination procedure, as allowed in 40 CFR 761.79(b), will attain the standard of $\leq 10 \mu\text{g}/100 \text{ cm}^2$ as stated in 40 CFR 761.79(b)(3)(i)(A); using a standard wipe test as described in 40 CFR 761.123. In this manner, equipment used for the remediation of PCB soil will be effectively decontaminated. Procedure for decontamination will be repeated as needed. Testing of collected standard wipe test samples will be performed in accordance with 40 CFR 761.272.

CAPSUR[®]

PCB EXTRACTION SYSTEM

CAPSUR is a patented, aqueous-based solvent system developed specifically for the extraction of Polychlorinated Biphenyl (PCB) from surfaces. CAPSUR has the capability of being applied as a foam which allows application to overhead, vertical and horizontal surfaces. CAPSUR is formulated to remove PCBs from concrete, asphalt, painted and metal surfaces. CAPSUR has demonstrated extraction efficiencies greater than 95 percent. This efficiency rate translates into less work, less time, and less product usage than conventional PCB cleaning products. CAPSUR easily vacuums up from surfaces. Surfaces are lightly rinsed with water, which is also vacuumed off. Easier removal results in lower labor cost. PCB removed with

CAPSUR applied as a foam use dramatically less product than other PCB cleaning products, resulting in less hazardous material to dispose of after the extraction.

PRODUCT COVERAGE

Application coverage rate will vary with surface porosity and operator proficiency.

The following are average coverage rates: Porous Concrete = 125 sq. ft. per gallon

Asphalt = 150 sq. ft. per gallon, Metals = 200 sq. ft. per gallon.

Painted surfaces should be patch tested prior to application as paint softening or discoloration may occur. ***CAPSUR is available in 5-and 55-gallon containers.***

Emergency information regarding ingestion, skin contact, eye contact or inhalation is included in the Material Safety Data Sheet (MSDS). If any of these emergencies occur, the

For additional product information, contact:

CAPSUR Benefits

- High extraction rate
- Lower labor cost
- 90% less waste disposal

INTEGRATED CHEMISTRIES, LLC

P.O. Box 10558

White Bear Lake, Minnesota 55110

Phone (651) 426-3224

Fax (651) 426-3114

Email: info@integratedchemistries.com

www.integratedchemistries.com



CAPSUR® MSDS

1. Supplier Information

Product Name CAPSUR®
Application PCB Extraction System
Supplier Integrated Chemistries, LLC
 PO Box 10558
 White Bear Lake, Minnesota 55110 USA
 651-426-3224

2. Composition/Information on Ingredients

<u>Name</u>	<u>EC no.</u>	<u>CAS no.</u>	<u>Content</u>	<u>Classification</u>
Aromatic hydrocarbon mixture	265-198-5	64742-94-5	40-50%	Xn: R65
Naphthalene	202-049-5	91-20-3	<3%	Xn: R22
Ethylene glycol monobutyl ether	203-905-0	111-76-2	<10%	Xi: R36/38
Cyclohexanol	230-630-6	108-93-0	<10%	Xi: R37/38
Monoethanolamine	285-483-3	141-43-5	<10%	Xi: R36/37/38

3. Hazards Identification

R65 Harmful, may cause lung damage if swallowed
R22 Harmful if swallowed
R36/38 Irritating to eyes and skin
R37/38 Irritating to respiratory system and skin
R36/37/38 Irritating to eyes, skin and respiratory system

4. First-Aid Measures

EYES: Immediately flush eyes with clear water for at least 15 minutes, occasionally lifting lower and upper lids. If irritation persists, seek medical attention.
SKIN: Wash with soap and water.
SWALLOWED: Avoid aspirating swallowed liquid into the lungs, which could cause lung injury
INHALED: If mist causes discomfort, leave area and move to fresh air.

5. Fire-Fighting Measures

Extinguishing media: CO2, Foam Dry chemical
Use self-contained breathing apparatus.
Cool and use caution when approaching fire-exposed containers.

6. Accidental Release Measures

Recover product for proper disposal.

7. Handling and Storage

Keep away from sources of heat

8. Exposure Controls/Personal Protection

No exposure limits have been established. Eye Protection and any chemically resistant gloves should be worn. Respiratory protection may be needed. Use a respirator with OV cartridges.

9. Physical and Chemical Properties

<u>Appearance:</u>	Fluorescent liquid	<u>Specific Gravity:</u>	0.97
<u>Color:</u>	Green	<u>Flash Point, C.:</u>	63
<u>Solubility in water:</u>	Insoluble	<u>pH, solution as supplied:</u>	11

10. Stability and Reactivity

Product is stable

Materials to avoid: Rubber, plastics, strong acids and strong oxidizing agents

11. Toxicological Information

Exposure limits have not been established, but product is not expected to be toxic. Naphthalene is a suspected carcinogen.

12. Ecological Information

This product may be harmful to aquatic life.

13. Disposal

Soak up any spills with inert absorbent for disposal.

Do not release any chemicals into sewers or waterways without government permission at all levels.

14. Transport

No restrictions

15. Regulatory Information

Labeling

None

Contains

Cleaning liquid

Risk Phrases

R65	Harmful, may cause lung damage if swallowed
R22	Harmful if swallowed

Safety Phrases

S62	If swallowed, do not induce vomiting, seek medical attention immediately and show this container or label
S2	Keep out of reach of children
S24/25	Avoid contact with skin and eyes
S37	Wear suitable gloves
S26	In case of eye contact, rinse immediately with plenty of water and seek medical advice
S15	Keep away from heat

16. Other Information

Emergency Telephone Contact Number:	CHEM-TEL, INC. Domestic: 800-255-3924 International: 813-248-0585
--	---

Date: 01-01-13